

BLANK ROME LLP

Todd M. Malynn (SBN 181595)
todd.malynn@blankrome.com
Arash Beral (SBN 245219)
arash.beral@blankrome.com
Jamison T. Gilmore (SBN 322100)
jamison.gilmore@blankrome.com
2029 Century Park East | 6th Floor
Los Angeles, CA 90067
Telephone: 424.239.3400
Facsimile: 424.239.3434

Attorneys for Defendants, Counterclaimants, and
Third Party Plaintiffs PCJV USA, LLC, PCI
TRADING LLC, POTATO CORNER LA
GROUP, LLC, GK CAPITAL GROUP, LLC,
NKM CAPITAL GROUP, LLC and GUY
KOREN, and Defendants J & K AMERICANA,
LLC, J&K LAKEWOOD, LLC, J&K
OAKRIDGE, LLC, J&K VALLEY FAIR, LLC, J
& K ONTARIO, LLC, J&K PC TRUCKS, LLC,
HLK MILPITAS, LLC, and GK CERRITOS, LLC

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

SHAKEY'S PIZZA ASIA VENTURES,
INC, a Philippines corporation,

Plaintiff,

vs.

PCJV USA, LLC, a Delaware limited
liability company; PCI TRADING , LLC, a
Delaware limited liability company; GUY
KOREN, an individual; POTATO CORNER
LA GROUP, LLC, a California limited
liability company; NKM CAPITAL GROUP,
LLC, a California limited liability company;
J & K AMERICANA, LLC, a California
limited liability company; J&K
LAKEWOOD, LLC, a California limited
liability company; J&K VALLEY FAIR,
LLC, a California limited liability company;
J & K ONTARIO, LLC, a California limited
liability company; HLK MILPITAS, LLC, a
California, limited liability company; GK
CERRITOS, LLC, a California, limited
liability company; J&K PC TRUCKS, LLC,
a California limited liability company; and,
GK CAPITAL GROUP, LLC, a California

Case No. 2:24-CV-04546-SB(AGRx)

Hon. Stanley Blumenfeld, Jr.

**DECLARATION OF JAMISON T.
GILMORE IN SUPPORT OF THE
PCJV USA PARTIES'
OPPOSITION TO SPAVI
PARTIES' MOTION IN LIMINE
NO. TWO (DKT. NO. 216)**

Complaint Filed: May 31, 2024
Trial Date: August 18, 2025

1 limited liability company and DOES 1
through 100, inclusive,

2 Defendants.

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4 PCJV USA, LLC, a Delaware limited
5 liability company; PCI TRADING LLC, a
6 Delaware limited liability company;
7 POTATO CORNER LA GROUP LLC, a
8 California limited liability company; GK
CAPITAL GROUP, LLC, a California
limited liability company; NKM CAPITAL
GROUP LLC, a California limited liability
company; and GUY KOREN, an individual,

9 Counter-Claimants,

10 v.

11 SHAKEY'S PIZZA ASIA VENTURES,
12 INC, a Philippines corporation,

13 Counter Defendant.

14 PCJV USA, LLC, a Delaware limited
15 liability company; PCI TRADING LLC, a
16 Delaware limited liability company;
17 POTATO CORNER LA GROUP LLC, a
18 California limited liability company; GK
CAPITAL GROUP, LLC, a California
limited liability company; NKM CAPITAL
GROUP LLC, a California limited liability
company; and GUY KOREN, an individual,

19 Third Party Plaintiffs,

20 v.

21 PC INTERNATIONAL PTE LTD., a
22 Singapore business entity; SPAVI
23 INTERNATIONAL USA, INC., a California
24 corporation; CINCO CORPORATION, a
Philippines corporation; and ROES 1 through
10, inclusive,

25 Third Party Defendants.

DECLARATION OF JAMISON T. GILMORE

I, Jamison T. Gilmore, declare as follows:

1. I am an associate at Blank Rome LLP, counsel of record for Defendants, Counterclaimants, and Third Party Plaintiffs (collectively, the “PCJV USA Parties”). I have personal knowledge of the facts herein and I could testify competently thereto. I submit this declaration in support of PCJV USA Parties’ Opposition to Plaintiff/Counter-Defendant or Third Party Defendants (“SPAVI Parties”) Motion *in Limine* No. Two (“MIL”).

2. We did not receive from SPAVI Parties their moving portion of the MIL by June 23, 2025 (or a letter by June 18, 2025).

3. On July 14, 2025, approximately 45 minutes before a scheduled meet and confer conference in connection with joint filings for July 25, 2025, we received meet and confer correspondence (Exh. 1 to Dkt. No. 216-1) regarding three contemplated motions *in limine*, including the MIL. No authority is provided in the letter substantiating the MIL.

4. I participated in the July 14, 2025 meet and confer when a discussion over the correspondence received 45 minutes earlier ensued. We were promised further authorities but none came. We expected to receive, at least, SPAVI Parties’ moving portion to enable us to insert our opposing portion. Without advance notice or discussion, however, SPAVI Parties unilaterally filed their motion after our call.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed July 21, 2025, within the United States its territories, possessions, or commonwealths.

By: /s/ Jamison T. Gilmore
Jamison T. Gilmore